

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Blackwing Bison Meats, Inc. and
Blackwing Ostrich Meats, Inc.

Plaintiffs,

v.

Union of Orthodox Jewish Congregations
of America

Defendant.

Case No 08-C-1908

Hon. Charles R. Norgle, Sr.

MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD

Defendant Union of Orthodox Jewish Congregations of America (the "Orthodox Union") respectfully requests, pursuant to Federal Rules of Civil Procedure Rule 6(b), that this Honorable Court grant it an extension of time to answer or otherwise plead until June 24, 2008. In support of their motion, Orthodox Union states as follows:

1. Plaintiffs filed the complaint in this matter on April 3, 2008.
2. The next day, Plaintiffs requested and Defendant agreed to waive service of process pursuant to Rule 4, Fed. R. Civ. P. Defendant returned to Plaintiffs, through counsel, an executed Waiver of Service of Summons form in the form provided by this Court on May 1, 2008.
3. The sixtieth day following April 4, 2008 is June 3, 2008.
4. The parties are actively engaged in efforts to resolve this dispute without further litigation, and desire to avoid the expense, delay and inconvenience to the Court associated with unnecessary litigation during such settlement negotiations.

5. Plaintiffs have consented to an indefinite extension of the response deadline during the settlement negotiations, subject to resetting of a response deadline in the future on two weeks' notice by Plaintiffs in the event that settlement negotiations are unsuccessful. Accordingly, the extension requested herein will not adversely impact the rights of any party.

WHEREFORE, for all of the foregoing reasons, Defendant Orthodox Union respectfully requests that this Court grant them an extension to file their answer or otherwise plead in this matter until June 24, 2008.

DATED: June 3, 2008.

Respectfully submitted,

/s/ Stacey L. Smiricky

One of the Attorneys for Defendant UNION
OF ORTHODOX JEWISH
CONGREGATIONS OF AMERICA

Stephen J. Landes
landes@wildman.com
Stacey L. Smiricky
smiricky@wildman.com
Wildman, Harrold, Allen & Dixon LLP
225 West Wacker Drive
Suite 2800
Chicago, IL 60606
(312) 201-2000
(312) 201-2555 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2008, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Harold M. Saalfeld
haroldsaalfeld@yahoo.com
25 N. County Street, Suite 2R
Waukegan, IL 60085

_____/s/ Stacey L. Smiricky